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5 *Attorney for Specially Appearing for Defendants*
6 *Jiangtian Sun a/k/a John Sun d/b/a as Sun Timepiece Trade, LLC*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9
10 DEV ANANTH DURAI,

11 Plaintiff,

12 v.

13 JIANGTIAN SUN, individually, and SUN
TIMEPIECE TRADE, LLC, a Nevada
14 Limited Liability Company; DOES 1 through
10, inclusive; DOES & ROES
15 CORPORATIONS ENTITIES 1 through 10
inclusive;

16 Defendants.
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Case No. 2:19-cv-00670-APG-GWF

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME FOR SPECIALLY APPEARING
DEFENDANTS JIANGTIAN SUN AND
SUN TIMEPIECE TRADE, LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFFS' COMPLAINT**

Complaint Filed: April 18, 2019

Amended Complaint Filed: April 23, 2019

Current Response Deadline:
May 9, 2019

Proposed New Response Deadline:
May 24, 2019

1 Plaintiff Dev Ananth Durai (“Plaintiff”) and Specially Appearing Defendants Jiangtian Sun
2 and Sun Timepiece Trade, LLC (“Specially Appearing Defendants”) by and through their
3 respective counsel of record, hereby stipulate and agree, with the Court’s approval, as follows:

4 **RECITALS**

5 WHEREAS, Plaintiff filed a complaint in this action initiating Case No. 2:19-cv-00670-
6 APG-GWF on April 18, 2019 (*See* ECF No. 1.);

7 WHEREAS, Plaintiff filed an amended complaint in this action on April 23, 2019 (*See*
8 ECF No. 5.);

9 WHEREAS, Specially Appearing Defendants’ deadline to answer or otherwise respond to
10 Plaintiff’s amended complaint is currently May 9, 2019;

11 WHEREAS, Plaintiffs agree to an extension until May 24, 2019 for the Specially
12 Appearing Defendants to respond to the Complaint due to Specially Appearing Defendants recent
13 acquisition of counsel;

14 WHEREAS, the Specially Appearing Defendants have not previously sought any
15 extensions of time to respond to the amended complaint;

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17 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
18 their counsel, as follows:


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- 1 • Specially Appearing Defendants will file their responsive pleading to the amended
2 complaint by or on May 24, 2019.

3 **SO STIPULATED.**

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5 DATED: May 22, 2019

ENENSTEIN PHAM & GLASS

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7 By: _____
8 ROBERT A. RABBAT, ESQ.
9 *Attorney for Specially Appearing*
10 *Defendants Jiangtian Sun*
11 *a/k/a John Sun d/b/a as Sun Timepiece*
12 *Trade, LLC*

13
14 DATED: May 22, 2019

THE THATER LAW GROUP, P.C.

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16 /s/ Maile Lani Esteban-Trinidad
17 MAILE LANI ESTEBAN-TRINIDAD
18 Attorney for Plaintiff Dev Ananth Durai

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20 **IT IS SO ORDERED:**

21 
22 _____
23 UNITED STATES MAGISTRATE JUDGE

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25 DATED: 5/23/2019